

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

LARRY SWANSON,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

Case No. 15 Civ. 5383 (ENV) (TAM)

v.

MANHATTAN BEER DISTRIBUTORS,  
LLC and SIMON BERGSON,

Defendants.

**DEFENDANTS' PROPOSED DISCOVERY SCHEDULE**

1. Parties to complete discovery: July 19, 2024
2. Plaintiff's deposition to be completed: June 17, 2024
3. Rule 30(b)(6) deposition regarding Plaintiff's New York Labor Law ("NYLL") overtime pay claim: June 28, 2024
4. Pre-motion conference letter relating to Defendants' anticipated motion for summary judgment on Plaintiff's NYLL overtime pay claim: by July 31, 2024
5. Deadlines for Expert Discovery to be determined after the Court's ruling on Defendants' anticipated summary judgment motion
6. Motion for Class Certification:
  - a. If limited to the claim for shortages, by November 1, 2024
    - i. Opposition Due: December 2, 2024
    - ii. Reply Due: December 20, 2024
  - b. If addressing both claims of shortages *and* NYLL overtime pay, within thirty (30) days of Court's ruling on Defendants' anticipated motion for summary judgment on Plaintiff's NYLL overtime pay claim.
    - i. Opposition Due: thirty (30) days following Plaintiff's filing of Motion for Class Certification
    - ii. Reply Due: twenty (20) days following opposition.